24-80041-Cr-Rosenberg/Reinhart

CASE NO.

21 U.S.C. § 841(a)(1) 21 U.S.C. § 846 18 U.S.C. § 924(c) 18 U.S.C. § 922(g)(1) 18 U.S.C. § 924(d)(1) 21 U.S.C. § 853

UNITED STATES OF AMERICA

v.

SAMANTHA HANA YI, a/k/a "China," and DARNELL JULIO MENDEZ,

Defendants.

FILED BY TM D.C.

Mar 28, 2024

ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA. - WPB

INDICTMENT

The Grand Jury charges that:

COUNT 1 Conspiracy to Distribute a Controlled Substance (21 U.S.C. § 846)

From in and around January 2022, the exact date being unknown to the Grand Jury, and continuing through on or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendants,

SAMANTHA HANA YI, a/k/a "China," and DARNELL JULIO MENDEZ,

did knowingly and willfully combine, conspire, confederate, and agree with each other and other known and unknown persons to the Grand Jury, to possess with intent to distribute and distribute a controlled

substance, in violation of Title 21, United States Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

With respect to the defendants, SAMANTHA HANA YI, a/k/a "China," and DARNELL JULIO MENDEZ, it is further alleged the controlled substance involved in the conspiracy attributable to each defendant as a result of each defendant's own conduct, and the conduct of other conspirators reasonably foreseeable to each defendant, is 40 grams or more of a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, fentanyl, a Schedule II Controlled Substance, and that death resulted from the use of such substance, in violation of Title 21, United States Code, Section 841(b)(1)(B).

COUNT 2 Distribution of a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about March 30, 2022, in Palm Beach County, in the Southern District of Florida, the defendants,

SAMANTHA HANA YI, a/k/a "China," and DARNELL JULIO MENDEZ,

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, fentanyl, a Schedule II Controlled Substance, and that death resulted from the use of such substance.

COUNT 3 Possession with Intent to Distribute a Controlled Substance (21 U.S.C. § 841(a)(1))

On or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendants,

SAMANTHA HANA YI, a/k/a "China," and DARNELL JULIO MENDEZ,

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, that is, fentanyl, a Schedule II Controlled Substance.

COUNT 4 Possession of a Firearm in Furtherance of a Drug Trafficking Crime (18 U.S.C. § 924(c))

On or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendants.

SAMANTHA HANA YI, a/k/a "China," and DARNELL JULIO MENDEZ,

did knowingly possess a firearm in furtherance of a drug trafficking crime, a felony offense for which the defendants may be prosecuted in a court of the United States, that is, a violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Counts 1 and 3 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

COUNT 5 Possession of a Firearm by a Prohibited Person (18 U.S.C. § 922(g))

On or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendant,

SAMANTHA HANA YI, a/k/a "China,"

did knowingly possess a firearm, in and affecting interstate and foreign commerce, knowing that she had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the firearms is:

- (i) one (1) Palmetto State Armory, PA-15, 5.56x45 rifle,
- (ii) one (1) Maverick Arms (Mossberg), Model 88, 12-Gauge shotgun,
- (iii) one (1) Carl Walther, PPS, .40 S&W pistol,
- (iv) one (1) Smith & Wesson, Model 10-5, .38 Special revolver,
- (v) one (1) North American Arms, NAA-22M, .22 revolver,
- (vi) one (1) Taurus International Mfg. (Brazil), Model 85, .38 Special revolver,
- (vii) one (1) Glock Inc., 42, .380 Auto pistol,
- (viii) one (1) Beretta, 92FS, 9mm pistol,
- (ix) one (1) Kel-Tec, PLR-16, 5.56 pistol,
- (x) one (1) FN Herstal, FNS-9, 9mm pistol,
- (xi) one (1) Ruger, Mark II, .22 pistol,
- (xii) one (1) Sig Sauer, P365, 9mm pistol,

- (xiii) one (1) Glock GMBH, 26, 9mm pistol, and
- (xiv) one (1) Smith & Wesson, Bodyguard 380 (BG380), .380 pistol.

COUNT 6 Possession of a Firearm by a Prohibited Person (18 U.S.C. § 922(g))

On or about March 6, 2024, in Palm Beach County, in the Southern District of Florida, the defendant,

DARNELL JULIO MENDEZ,

did knowingly possess a firearm, in and affecting interstate and foreign commerce, knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the firearms is:

- (i) one (1) Palmetto State Armory, PA-15, 5.56x45 rifle,
- (ii) one (1) Maverick Arms (Mossberg), Model 88, 12-Gauge shotgun,
- (iii) one (1) Carl Walther, PPS, .40 S&W pistol,
- (iv) one (1) Smith & Wesson, Model 10-5, .38 Special revolver,
- (v) one (1) North American Arms, NAA-22M, .22 revolver,
- (vi) one (1) Taurus International Mfg. (Brazil), Model 85, .38 Special revolver,
- (vii) one (1) Glock Inc., 42, .380 Auto pistol,
- (viii) one (1) Beretta, 92FS, 9mm pistol,
- (ix) one (1) Kel-Tec, PLR-16, 5.56 pistol,
- (x) one (1) FN Herstal, FNS-9, 9mm pistol,
- (xi) one (1) Ruger, Mark II, .22 pistol,

- (xii) one (1) Sig Sauer, P365, 9mm pistol,
- (xiii) one (1) Glock GMBH, 26, 9mm pistol, and
- (xiv) one (1) Smith & Wesson, Bodyguard 380 (BG380), .380 pistol.

FORFEITURE ALLEGATIONS

- 1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants, SAMANTHA HANA YI, a/k/a "China," and DARNELL JULIO MENDEZ, have an interest.
- 2. Upon conviction of a violation of Title 21, United States Code, Section(s) 841 and/or 846, as alleged in this Indictment, the defendants shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, pursuant to Title 21, United States Code, Section 853.
- 3. Upon conviction of a violation of Title 18, United States Code, Section(s) 922(g) and/or 924(c), or any other criminal law of the United States, as alleged in this Indictment, the defendants shall forfeit to the United States any firearm and ammunition involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924(d)(1).

All pursuant to and Title 18, United States Code, Section 924(d)(1), and Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON

MARKENIN LAPOINTE

UNITED STATES ATTORNEY

SHANNON O'SHEA DARSCH

ASSISTANT UNITED STATES ATTORNEY

UN	ITED STATES OF AMERICA	CASE NO.:
v. SAMANTHA HANA YI, a/k/a "China," and		CERTIFICATE OF TRIAL ATTORNEY
DA	RNELL JULIO MENDEZ /	
	Defendants.	Superseding Case Information:
Cou	urt Division (select one)	New Defendant(s) (Yes or No)
	☐ Miami ☐ Key West ☐ FTP ☐ FTL ☐ WPB	Number of New Defendants Total number of new counts
	hereby certify that:	
1.	I have carefully considered the allegations witnesses and the legal complexities of the	of the indictment, the number of defendants, the number of probable
2.	I am aware that the information supplied on	this statement will be relied upon by the Judges of this Court in setting ls under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3.	Interpreter: (Yes or No) No List language and/or dialect:	
4.	This case will take days for the parti	es to try.
5.	(Check only one) (Check only one) I □ 0 to 5 days □ Pe II □ 6 to 10 days □ Mi III □ 11 to 20 days □ Mi IV □ 21 to 60 days □ Fe	neck only one) tty inor isdemeanor
6.	If yes, Judge	Case No.
7.	Has a complaint been filed in this matter If yes, Magistrate Case No. 24-8095-RN	
8.	If yes, Judge	d matter in this District Court? (Yes or No) No Case No.
9.		larch 6, 2024
10		
11		
12 13		es of No) No ending in the Northern Region of the U.S. Attorney's Office
13	prior to August 8, 2014 (Mag. Judge Sha	
14		
15	. Did this matter involve the participatio	n of or consultation with Magistrate Judge Eduardo I. Sanchez Office, which concluded on January 22, 2023? No
16	5. Did this matter involve the participation	of or consultation with now Magistrate Judge Marta Fulgueira Attorney's Office, which concluded on March 5, 2024? No
		By: Shannon O'Shea Darsch
		Assistant United States Attorney

FL Bar No.

68566

PENALTY SHEET

Defendant's Name: Samantha Hana Yi, aka "China"
Case No:
Count #: 1
Conspiracy to Distribute a Controlled Substance (Fentanyl) Resulting in the Death of Another
21 U.S.C. §§ 841(a)(1), 841 (b)(1)(B), and 846 * Max. Term of Imprisonment: Life Imprisonment * Mandatory Min. Term of Imprisonment (if applicable): 20 Years Imprisonment * Max. Supervised Release: Minimum 3 years to life term * Max. Fine: \$5,000,000 * Special Assessment: \$100.00
Count #: 2
Distribution of a Controlled Substance (Fentanyl) Resulting in the Death of Another 21 U.S.C. § 841(a)(1), 841 (b)(1)(C) * Max. Term of Imprisonment: Life Imprisonment * Mandatory Min. Term of Imprisonment (if applicable): 20 Years Imprisonment * Max. Supervised Release: Minimum 3 years to life term * Max. Fine: \$1,000,000 * Special Assessment: \$100.00
Count #: 3
Possession with Intent to Distribute Fentanyl
21 U.S.C § 841(a)(1) and 841(b)(1)(C) * Max. Term of Imprisonment: 20 Years Imprisonment * Mandatory Min. Term of Imprisonment (if applicable): N/A * Max. Supervised Release: 3 Years to Life * Max. Fine: \$1,000,000

^{*}Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

Count #: 4

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

18 U.S.C. § 924(c)(l)(A)(i)

- * Max. Term of Imprisonment: Life
- * Mandatory Min. Term of Imprisonment: 5 years, consecutive to any other term of imprisonment
- * Max. Supervised Release: 5 years
- * Max. Fine: \$250,000.

Count #: 5

Felon in Possession of a Firearm

18 U.S.C. §§ 922(g)(1)

- *Max. Term of Imprisonment: 15 years
- * Mandatory Min. Term of Imprisonment (if applicable): N/ A
- * Max. Supervised Release: 3 Years
- * Max. Fine: \$250,000

^{*}Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

PENALTY SHEET

Defendant's Name: Darnell Julio Mendez
Case No:
Count #: 1
Conspiracy to Distribute a Controlled Substance (Fentanyl) Resulting in the Death of Another
21 U.S.C. §§ 841(a)(1), 841 (b)(1)(B), and 846 * Max. Term of Imprisonment: Life Imprisonment * Mandatory Min. Term of Imprisonment (if applicable): 20 Years Imprisonment * Max. Supervised Release: Minimum 3 years to life term * Max. Fine: \$5,000,000 * Special Assessment: \$100.00
Count #: 2
Distribution of a Controlled Substance (Fentanyl) Resulting in the Death of Another
21 U.S.C. § 841(a)(1), 841 (b)(1)(C) * Max. Term of Imprisonment: Life Imprisonment * Mandatory Min. Term of Imprisonment (if applicable): 20 Years Imprisonment * Max. Supervised Release: Minimum 3 years to life term * Max. Fine: \$1,000,000 * Special Assessment: \$100.00
Count #: 3
Possession with Intent to Distribute Fentanyl
21 U.S.C § 841(a)(1) and 841(b)(1)(C)
* Max. Term of Imprisonment: 20 Years Imprisonment
* Mandatory Min. Term of Imprisonment (if applicable): N/A
* Max. Supervised Release: 3 Years to Life * Max. Fine: \$1,000,000

^{*}Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.

Count #: 4

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

18 U.S.C. § 924(c)(l)(A)(i)

- * Max. Term of Imprisonment: Life
- * Mandatory Min. Term of Imprisonment: 5 years, consecutive to any other term of imprisonment
- * Max. Supervised Release: 5 years
- * Max. Fine: \$250,000.

Count #: 6

Felon in Possession of a Firearm

18 U.S.C. §§ 922(g)(1)

- *Max. Term of Imprisonment: 15 years
- * Mandatory Min. Term of Imprisonment (if applicable): N/A
- * Max. Supervised Release: 3 Years
- * Max. Fine: \$250,000

^{*}Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.